



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
Attorney General

DIVISION OF SOCIAL JUSTICE
Environmental Protection Bureau

December 9, 2024

BY CM/ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Chan v. U.S. Department of Transportation*
No. 1:23-cv-10365-LJL
Mulgrew v. U.S. Department of Transportation
No. 1:24-cv-01644-LJL

Dear Judge Liman:

We write on behalf of Stephanie Winkelhake, defendant in the two above-referenced cases. On December 2, 2024, the *Chan* and *Mulgrew* plaintiffs filed summary judgment motions [*Chan* ECF Nos. 136, 136-1; *Mulgrew* ECF Nos. 124, 124-1]. Earlier today, defendants Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority (collectively, “MTA/Triborough”) filed papers opposing the plaintiffs’ motions and in support of MTA/Triborough summary judgment cross-motions [*Chan* ECF Nos. 147, 148; *Mulgrew* ECF Nos. 133, 134]. Ms. Winkelhake joins the MTA/Triborough cross-motions and opposes the plaintiffs’ motions for the reasons set out in the MTA/Triborough papers.

Respectfully submitted,

/s/ Andrew G. Frank

Andrew G. Frank
Assistant Attorney General

c: All counsel of record (by CM/ECF):